

(13) Any other matters which the parties deem appropriate.

DEFENDANTS

Cross-examination of defense witnesses on Plaintiff's direct case is not a foregone conclusion. Plaintiff will have to show that she meets the criteria. If the Court allows Plaintiff to cross-examine defense witnesses on her case-in-chief, defendants intend to cross their own witnesses and call them again on their case-in-chief.

If Plaintiff is allowed to testify about purchase of prescription drugs, Defendants have the right to use Plaintiff's medical records.

If the Court allows Plaintiff to seek both liquidated damages and punitive damages, Defendants reserve the right to supplement their jury instructions and jury verdict sheets.

Defendants object to Plaintiff's use of her expert's deposition transcript in lieu of live testimony, since he is not an unavailable witness and should be directed to testify in person.

If the Court allows Plaintiff's expert report as an admissible exhibit, then Defendants reserve the right to supplement their exhibits with their expert's report.

Defendants reserve the ability to use any deposition testimony at trial.